

Exhibit 3

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Attorneys for Plaintiff,
 Catherine E. Youngman, Litigation Trustee
 for ASHINC Corporation, et al.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF LOS ANGELES

CATHERINE E. YOUNGMAN, in her
 capacity as LITIGATION TRUSTEE FOR
 ASHINC CORPORATION, et al., as successor
 to THE OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS OF ASHINC
 CORPORATION, AND ITS AFFILIATED
 DEBTORS,

Plaintiff,

v.

YUCAIPA AMERICAN ALLIANCE FUND I,
 LLC, YUCAIPA AMERICAN
 MANAGEMENT, LLC; BOARD OF FIRE
 AND POLICE PENSION COMMISSIONERS
 OF THE CITY OF LOS ANGELES;
 CALIFORNIA PUBLIC EMPLOYEES'
 RETIREMENT SYSTEM; CARPENTERS
 PENSION TRUST FOR NORTHERN
 CALIFORNIA; LOS ANGELES CITY
 EMPLOYEES RETIREMENT SYSTEM;
 PACIFIC COAST ROOFERS PENSION
 PLAN; and DOES 1-10, inclusive,

Defendants.

Case No. 21STCV37137

**STIPULATION TO EXTEND
 DEADLINE TO RESPOND TO
 COMPLAINT; ~~PROPOSED~~ ORDER**

1 Plaintiff Catherine E. Youngman, solely in her capacity as the Litigation Trustee and Plan
 2 Administrator (“Plaintiff”) for ASHINC Corporation and related Debtors and defendant Yucaipa
 3 American Alliance Fund I, LLC; defendant Yucaipa American Management, LLC; defendant
 4 Board of Fire and Police Pension Commissioners of the City of Los Angeles; defendant
 5 California Public Employees’ Retirement System; defendant Carpenters Pension Trust for
 6 Northern California; defendant Los Angeles City Employees’ Retirement System; and, defendant
 7 Pacific Coast Roofers Pension Plan (collectively, “Defendants”) hereby stipulate and respectfully
 8 request that the Court extend the time for Defendants to file a responsive pleading to Plaintiff’s
 9 Complaint until up to, and including, February 11, 2022.

11 The parties hereby stipulate and agree to the following:

12 WHEREAS, Plaintiff filed its complaint on October 7, 2021 (the “Complaint”);

13 WHEREAS, defendant Yucaipa American Alliance Fund I, LLC was served with the
 14 Summons and Complaint on November 4, 2021, with service effective on the same day pursuant
 15 to the California *Code of Civil Procedure* section;

16 WHEREAS, defendant Yucaipa American Management, LLC was served with the
 17 Summons and Complaint on November 4, 2021, with service effective on the same day pursuant
 18 to the California *Code of Civil Procedure*;

19 WHEREAS, defendant Board of Fire and Police Pension Commissioners of the City of
 20 Los Angeles was served with the Summons and Complaint on November 3, 2021, with service
 21 effective on the same day pursuant to the California *Code of Civil Procedure*;

22 WHEREAS, defendant California Public Employees’ Retirement System (“CalPERS”)
 23 was served with the Summons and Complaint on November 3, 2021, with service effective on the
 24 same day pursuant to the California *Code of Civil Procedure*;

1 WHEREAS, defendant Carpenters Pension Trust for Northern California was served with
2 the Summons and Complaint on November 8, 2021, with service effective on the same day
3 pursuant to the California *Code of Civil Procedure*;

4 WHEREAS, defendant Los Angeles City Employees' Retirement System was served with
5 the Summons and Complaint on November 8, 2021, with service effective on the same day
6 pursuant to the California *Code of Civil Procedure*;

7 WHEREAS, defendant Pacific Coast Roofers Pension Plan was served with the Summons
8 and Complaint on November 8, 2021, with service effective on the same day pursuant to the
9 California *Code of Civil Procedure*;

10 WHEREAS, Plaintiff and Defendants believe there is good cause to extend the deadline
11 for Defendants to respond to the Complaint because (1) of ongoing early-stage litigation in a
12 related proceeding in the United States Bankruptcy Court for the District of Delaware; (2) some
13 Defendants continue their efforts to retain counsel; and (3) the upcoming holiday season.

14 WHEREAS, Plaintiff agrees to extend the deadline for Defendants to file a responsive
15 pleading until February 11, 2022.

16 WHEREAS, Plaintiff and Defendants hereby request the Court continue the Case
17 Management Conference currently set for February 1, 2022, until April 1, 2022, or another date
18 the Court finds convenient.

19 WHEREAS, California Rule of Court 3.110(e) permits this Court to extend the deadline
20 for a defendant to file a responsive pleading after service of the initial complaint;

21 The parties hereby STIPULATE that Defendants' deadline to file responsive pleadings to
22 the Complaint is extended until February 11, 2022, and Defendants will file their responsive
23 pleadings on or before February 11, 2022.

24 The parties further STIPULATE to continue the Case Management Conference from
25 February 1, 2022, to April 1, 2022, or another date the Court finds convenient.

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Date: November 23, 2021

Fox Rothschild LLP



Keith Owens
Jeff H. Grant
Matthew Follett

*Attorneys for Catherine E.
Youngman, solely in her capacity of
Litigation Trustee for Ashinc
Corporation, et. al.*

Glaser Weil Fink Howard Avchen &
Shapiro LLP

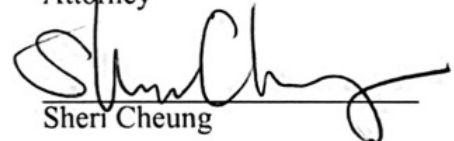
Date: November 22, 2021

Craig H. Marcus
Craig H. Marcus

*Attorneys for Yucaipa American
Alliance Fund I, LLC and Yucaipa
American Management, LLC.*

Public Pensions General Counsel
Division
Office of the Los Angeles City
Attorney

Date: NOV 19, 2021


Sheri Cheung

*Attorneys for Board of Fire and
Police Pension Commissioners of the
City of Los Angeles and Los Angeles
City Employees' Retirement System*

CalPERS Legal Office

Date: November 19, 2021

Marte Castanos
Marte Castaños

Attorneys for CalPERS

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Date: 11/23/2021

Kraw Law Group


George M. Kraw

*Attorneys for Carpenters Pension
Trust for Northern California*

Date: 11/22/2021

Saltzman & Johnson Law
Corporation


Matthew P. Minser

*Attorneys for Pacific Coast Roofers
Pension Plan*

~~[PROPOSED]~~ ORDER

Good cause having been shown, the Court hereby ORDERS that Defendants' responsive pleadings to the Plaintiff's Complaint is due on February 11, 2022. The Court further ORDERS the Case Management Conference set for February 1, 2022, to be continued until

~~HOFFER & KILPATRICK~~.

IT IS SO ORDERED.

Dated: 01/04/2022




Judge of the Superior Court
Armen Tamzarian / Judge

PROOF OF SERVICE**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 10250 Constellation Blvd., Suite 900, Los Angeles, CA 90067.

On November 30, 2021, I served the following document(s) described as: **NOTICE OF RELATED CASE AND STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT; [PROPOSED] ORDER** on the interested parties in this action as follows:

<p>Craig H. Marcus Glaser Weil Fink Howard Avchen & Shapiro LLP 10250 Constellation Blvd 19th FL Los Angeles, CA 90067</p> <p>Email: cmarcus@glaserweil.com</p> <p>Attorneys for Yucaipa American Alliance Fund I, LLC & Yucaipa American Management, LLC</p>	<p>Sheri Cheung Public Pensions General Counsel Division Office of the Los Angeles City Attorney 202 W 1st St Ste 500 Los Angeles, CA 90012-4401</p> <p>Email: sheri.cheung@lacity.org</p> <p>Attorneys for Board of Fire and Police Pension Commissioners of the City of Los Angeles and Los Angeles City Employees' Retirement System</p>
<p>Marte Castaños CalPERS Legal Office 400 Q St Sacramento, CA 95814</p> <p>Email: marte.castanos@calpers.ca.gov</p> <p>Attorneys for CalPERS</p>	<p>George M. Kraw Kraw Law Group 605 Ellis St Ste 200 Mountain View, CA 94043-2231</p> <p>Email: gkraw@kraw.com</p> <p>Attorneys for Carpenters Pension Trust for Northern California</p>
<p>Matthew P. Minser Saltzman & Johnson Law Corporation 1141 Harbor Bay Pkwy Ste 100 Alameda, CA 94502-6594</p> <p>Email: mminser@sjlawcorp.com</p> <p>Attorneys for Pacific Coast Roofers Pension Plan</p>	

[] BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Fox Rothschild LLP practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

[X] BY E-MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an

1 agreement of the parties to accept service by e-mail or electronic transmission, I caused the
2 document(s) to be sent from e-mail address jochoa@foxrothschild.com to the persons at the e-
3 mail addresses listed above. I did not receive, within a reasonable time after the transmission, any
4 electronic message or other indication that the transmission was unsuccessful.

5 ☐ **BY OVERNIGHT MAIL (FEDEX):** I enclosed said document(s) in an envelope or
6 package provided by FEDEX and addressed to the persons at the addresses listed above. I placed
7 the envelope or package for collection and overnight delivery at an office or a regularly utilized
8 drop box of FEDEX or delivered such document(s) to a courier or driver authorized by FEDEX to
9 receive documents.

10 ☐ **BY PERSONAL SERVICE:** I caused said document to be personally delivered the
11 document(s) to the person at the addresses listed above by leaving the documents in an envelope
12 or package clearly labeled to identify the attorney being served with a receptionist or an
13 individual in charge of the office.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16 Executed on November 30, 2021, at Los Angeles, California.

17 /s/ Janeth Ochoa
18 Janeth Ochoa